

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

JANE DOE 2,	)	
	)	
Plaintiff,	)	Civil Action No. 3: 2023-cv-00582
	)	
v.	)	
	)	JUDGE ALETA A. TRAUGER
JIMMIE ALLEN, AADYN’S DAD	)	
TOURING, INC., CHARLES HURD,	)	JURY TRIAL DEMANDED
and JOHN DOES 1-100,	)	
	)	
Defendants.	)	

**[PROPOSED] ORDER**

Upon the unopposed Motion of Plaintiff for protective order to proceed in this matter under a pseudonym and a review of the Complaint and the Declaration of Jane Doe 2, and with the Defendant’s agreement, Plaintiff’s Motion is **GRANTED**. Accordingly, the Court hereby **ORDERS** as follows:

1. Plaintiff is permitted to proceed under the pseudonym Jane Doe 2 in this matter.
2. This Order governs all discovery, or all information disclosed, produced, or submitted by any party to any other party in connection with this action during the course of discovery. “Discovery” includes all written discovery, requests for production, interrogatories, requests for admissions, requests for disclosure, oral depositions, deposition transcripts, oral or video graphic recording of a deposition, depositions on written questions to third parties, and subpoenas to third parties, and other documents exchanged between the parties for the purpose of sharing information regarding the facts of the case.

3. This Order is entered for purposes of this Litigation and shall remain in full force and effect unless modified by an order of the Court or by the written stipulation of all parties filed with this Court. This Order will not be used in any manner or form, directly or indirectly, as evidence in any trial or any hearing, other than to resolve any issue related to the enforcement of any provision of the Order.
4. All such discovery shall be confidential and shall not be used or disclosed to any third party or filed with the Court without first redacting all identifying information that can be used to ascertain the identity of Jane Doe 2. "Identifying information" includes Jane Doe 2's true first and last name, social security number, date of birth, home address, and other material from which her identity is ascertainable, including but not limited to Jane Doe 2's social media account names or photographs and the true names of Jane Doe 2's family members.
5. All pleadings, or other Court filings, shall be redacted to protect Jane Doe 2's identity or identifying information.
6. All depositions on written questions and subpoenas to third parties sent to acquire information regarding Jane Doe 2 shall not identify Jane Doe 2. Once the information is acquired from third parties, such responses shall be maintained as confidential as set forth above.
7. Each person to whom un-redacted discovery containing confidential information is disclosed or made available shall first be advised of the existence and the contents of this Order. Un-redacted discovery may only be inspected or revealed by the Parties to the following persons: to any agent, representative, insurer, consultant, or expert of any Party for their use in evaluating the case, provided that the disclosing Party is

responsible for ensuring that any agent, representative, insurer, consultant or expert is under the Party's control and shall maintain the document as confidential as set forth in this Order. Any mediator, in this case, may be provided un-redacted discovery so long as the discovery is being disclosed pursuant to confidential settlement negotiations.

8. In all filings, hearings, or other interactions with the Court that are part of the public record, the Parties shall maintain the anonymity of Jane Doe 2 by using the pseudonym Jane Doe 2 as applicable and shall further maintain the anonymity of Jane Doe 2 by using pseudonyms for her family members. The Parties shall not file any document disclosing identifying information sufficient to ascertain the identity of Jane Doe 2 without redacting the identifying information.
9. If any specific issues related to non-disclosure of Plaintiff's identity arise during the course of the litigation, the Parties shall seek to resolve those issues without court intervention. If the Parties are unable to agree, they shall seek further clarification from the Court.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2024

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Judge Aleta A. Trauger